

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2018-202-E**

IN RE: Petition of Duke Energy Carolinas, LLC	)	
and Duke Energy Progress, LLC for	)	<b>INTERVENOR, SOUTH CAROLINA</b>
Approval of CRPE Queue Number	)	<b>SOLAR BUSINESS ALLIANCE, INC.'S</b>
Proposal, Limited Waiver of Generator	)	<b>FIRST</b>
Interconnection Procedures, and Request	)	<b>REQUEST FOR PRODUCTION</b>
for Expedited Review	)	

**TO: REBECCA J. DULIN, ESQUIRE, ATTORNEY OF RECORD FOR DUKE ENERGY CAROLINAS, LLC AND DUKE ENERGY PROGRESS, LLC:**

Intervenor, South Carolina Solar Business Alliance, Inc., (hereinafter as, "SCSBA"), pursuant to Reg. 103-833, hereby serves, **Duke Energy Carolinas, LLC and Duke Energy Progress, LLC**, (hereinafter together as, "Duke") with SCSBA's First Request for Production, to be answered separately within twenty (20) days from the date of service hereof. Please set forth Duke's answers separately, after restating the question.

This Request for Production shall be deemed continuing, and if complete production to any of them is not presently available, and the information becomes available before trial, supplemental production is required at such time as this information becomes available to Plaintiff.

IF DUKE CONTENDS THAT ANY OF THE REQUESTED MATERIAL NEED NOT BE PRODUCED, IDENTIFY SUCH MATERIAL AND SET FORTH THE BASIS FOR DUKE'S CONTENTION IN ACCORDANCE WITH RULE 26(b)(5) OF THE SOUTH CAROLINA RULES OF CIVIL PROCEDURE.

**INSTRUCTIONS**

**IT IS HEREIN REQUESTED:**

1. That all information shall be provided to the undersigned in the format as requested.
2. That all responses to the below Requests for Production shall be labeled using the same numbers as used herein.
3. That if the requested information is found in other places or in other exhibits, reference not be made to those, but, instead, that the information be reproduced and placed in the responses to these Requests for Production in the appropriate sequence.
4. That any inquiries or communication relating to questions concerning clarifications of the data requested below be directed to the undersigned.
5. That all exhibits be reduced to an 8 1/2" x 11" format.
6. That each Request be reproduced at the beginning of the response thereto.

7. That Duke provides the undersigned with responses to these Requests for Production as soon as possible but **not later than twenty (20) days from the date of service hereof.**

8. If the response to any Requests for Production is that the information requested is not currently available, state when the information requested will become available.

9. These Requests for Production shall be deemed continuing so as to require Duke to supplement or amend its responses as any additional information becomes available up to and through the date of trial.

10. If a privilege not to answer a Request is claimed, identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim.

11. If a refusal to respond to a Request is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of hours and costs required to conduct the search.

12. Answer each Request on the basis of the entire knowledge of Duke, including information in the possession of Duke or its consultants, representatives, agents, experts, operating divisions, business divisions, assigns, partners, and attorneys, if any.

13. If any Request cannot be answered in full, respond to the extent possible and specify the reasons for Duke's inability to produce.

14. **Please provide copies of the information responsive to this request in electronic working spreadsheet (Microsoft Excel) format with all data and formulas intact, to the extent feasible.**

### **DEFINITIONS**

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. **"You" or "your" shall refer to, Duke.**
2. **The conjunctions "and" and "or" shall be interpreted** in each and every instance as meaning "and/or" and shall in neither instance be interpreted disjunctively to exclude any document or information otherwise within the scope of any description or request made herein.
3. **"Document" shall mean** all originals of any nature whatsoever, identical copies and all non-identical copies thereof, pertaining to any medium upon which intelligence or

First Request for Production

August 9, 2018

Page 3 of 4

information is recorded in Duke's possession, custody or control, or other tangible objects regardless of where located; including, without limiting the generality of foregoing, punch cards, print-out sheets, movie film, slides, photographs, records, work papers, source documents, microfilm, notes, letters, memoranda, ledgers, worksheets, books, magazines, notebooks, diaries, calendars, appointment book registers, charts, cable, papers, agreements, contracts, purchase orders, acknowledgements, invoices, authorizations, budgets, analyses, projections, transcripts, minutes of meeting of any kind, correspondence, telegrams, drafts, data processing disks or tapes, or computer-produced interpretations thereof, instructions, announcements, schedules, and price list. Media includes data on computers, laptop computers, netbook computers, cell phones, telephones, PDA's, Blackberry's or Blackberry type devices, smart phones, external hard drives and flash drives or storage devices of any type, of Duke and specifically includes the computer and or laptop computers utilized by Representatives of Duke. Media means media, as broadly as the term "media" may be defined, that contains electronic data, as to the Interaction between SCSBA and Duke.

4. **"Identify" or "identity"** used with reference to an individual means to state his or her full name, present or last known address, present or last known position and business affiliation, and employer, title, and position at the same time in question.

5. **"Identify" or "identity"** used with reference to a writing means to state the date, author, type of document (e.g. letter, memorandum, telegram, chart, note, application, etc.) or other means of identification, and its present location or custodian. If any such document is no longer in Duke's possession or subject to their control, state what disposition was made of the document(s).

6. All references to the singular contained herein shall be deemed to include the appropriate plural number and all references to the plural shall be deemed to include the singular. All references to the masculine gender contained herein shall be deemed to include the appropriate feminine and neuter genders.

**FIRST REQUEST FOR PRODUCTION**

1. Please provide copies of all documents, papers and responses provided to the South Carolina Office of Regulatory Staff, in response to the South Carolina Office of Regulatory Staff's Data Request(s), or Discovery Request(s), in this Docket.

/s/

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Alliance, Inc.

August 9, 2018  
Columbia, South Carolina